

OBJECTIVE

Establish the framework of action to identify, detect, report, monitor, manage and mitigate Corruption Risks in all its modalities, including Bribery.

SCOPE

This policy applies to all employees, managements, shareholders, business partners and other stakeholders of Grupo Energía Bogotá S.A. ESP. and the controlled companies that comprise it (subsidiaries), including Transportadora de Gas Internacional S.A. ESP (hereinafter "TGI"), in accordance with the regulations applicable in each of the jurisdictions where they are domiciled.

DECLARETIONS OF COMMITMENTS

1. GENERAL COMMITMENTS

- 1.1 Promote and strengthen the ethical and legal framework, through the awareness and training of employees in the prevention, detection, and reporting of corruption in all its forms, including bribery.
- 1.2 Ensure mechanisms for reporting possible corruption, bribery, unethical or illegal conduct, ensuring a confidential whistleblowing system and generating confidence in reporters and / or whistleblowers by applying protection measures for them.
- 1.3 Establish pertinent measures for the adequate identification and mitigation of risks of corruption and / or bribery in contractual relationships.

2. COMMITMENTS OF PREVENTION OF TRANSNATIONAL BRIBERY AND CORRUPTION

- 2.1 Promote legality, ethics and transparency, as well as our corporate values, as the guiding basis for action, management, conduct managers and collaborators within the framework of any relationship with any interest group.
- 2.2 Assume a position of zero tolerance against any illegal, unethical act or omission that allows the materialization of the risks of corruption, bribery.
- 2.3 Not to offer, promise, deliver or solicit undue advantages of any value, directly or indirectly, and regardless of their location, as an incentive to obtain a benefit of their own or in favor of third parties
- 2.4 Identify and comply with current applicable legislation on prevention, detection, and punishment both in relation to corruption and bribery and its related facts.
- 2.5 Establish and document a methodology to identify, detect, report, monitor, manage and mitigate corruption and bribery risks. This method should be updated at least 1 time a year or when special circumstances occur, such as a change in market conditions, new business, corporate reorganizations.
- 2.6 Ensure the conditions that allow our stakeholders to denounce any conduct constituting or presuming to constitute corruption in all its forms, including bribery, through any of the access channels of the TGI and GEB Ethics Channel, generating an environment of control, security, and trust, establishing the prohibition of retaliation against reporters.
- 2.7 Promote awareness among employees, managers, and other stakeholders through a detailed communication program.

- 2.8 Strictly comply with the provisions contained in the Financial Policy in reference to the recording of transactions through robust accounting systems ensuring the evidence and registration of information and ensuring that accounting records reflect in a manner reasonable, transparent, accurate and complete all operations, as well as having sufficient support, rejecting any manipulation, statement or fictitious, misleading, false or intentionally misleading record.
- 2.9 Not to make or receive any cash payment that aims to obtain undue benefits, ensuring compliance with the provisions that exist or are issued by the company, among others, the Gift Guidelines and Attentions.
- 2.10 Prevent reputational damage through the adoption and compliance with policies and procedures that prohibit conduct constituting corruption in all its forms, including bribery.
- 2.11 Promote the continuous improvement of the anti-bribery management system.
- 2.12 Perform due diligence procedures to all its counterparts for the adequate identification of legal, reputational, and operational risks associated with corruption and / or bribery.
- 2.13 Not to make any facilitation payments, in accordance with the provisions of the Code of Ethics and Conduct of TGI and GEB. Any payment aimed at ensuring or expediting the course of a necessary procedure or action, such as the issuance of a license, authorization, document, certification, is prohibited.
- 2.14 Refrain from retaliating against Directors and / or collaborators for refusing to pay or receiving bribes within the framework of the company's business and processes.

3. COMMITMENTS TO WHISTLEBLOWER PROTECTION

- 3.1 Accept the recommendations and international standards issued by Transparency International, which urge public and private institutions to enact norms that seek to protect the whistleblower, among others.
- 3.2 Guarantee the possibility of making complaints, reports and / or consultations anonymously, ensuring that such anonymity is not distorted or distorted at any stage of the process of both investigation and possible sanction, except by court order.
- 3.3 Guarantee the confidentiality of the information provided by any complainant, providing security measures towards it and limiting access to it.
- 3.4 Ensure and have tools and processes that avoid any retaliation against any natural or legal person who files a complaint or complaint through the TGI and GEB Ethics Channel.
- 3.5 Take preventive and active measures aimed at generating a culture based on trust, cooperation, transparency and integrity, providing security to all employees and interest groups for the effective presentation of reports, consultations and complaints to the Ethical Channel.
- 3.6 Promote a culture of denunciation, reporting and/or consultation, through communication mechanisms on the effectiveness of the channel, the investigations carried out, the results obtained and the sanctions imposed.
- 3.7 Ensure that all allegations or reports made in good faith, or based on a reasonable belief of violation or suspected violation of this Policy, the Code of Ethics and Conduct or the ethical framework and legal of TGI and GEB, are duly investigated, imposing, as a result of these and the corroboration of the facts, the corresponding sanctions.

- 3.8 Adopt the necessary measures to prevent any act of discrimination or situation that may be understood as workplace harassment, threat, isolation, degradation, deterioration or affectation of working conditions, increase in workload, impediment or disproportionate difficulties for promotions, transfer, dismissal, victimization, unjustified or unreasonable refusal to leave, vacation, leave or other forms of harassment, to any collaborator who makes a complaint or report through the ethical channel or who contributes to information in the context of an investigation.
- 3.9 Adopt as a serious offense and as a violation of this Policy and the Code of Ethics and Conduct, any retaliation against whistleblowers and/or reporters of potential cases of corruption in any of its modalities, including bribery.
- 3.10 Establish, when required, mechanisms for physical protection, legal and/or emotional or psychological support for the complainant or the person who contributes information within the framework of the investigations carried out on the occasion of the report in the ethical channel.

4. RESPONSIBLE

- 4.1 The **Board of Directors** is responsible for approving this Policy and exercising permanent leadership and commitment regarding the anti-bribery and anti-corruption management system, in order to ensure compliance with the established commitments and their updating permanent.

The Board of Directors will monitor compliance with this policy through the semi-annual report submitted by TGI's Compliance Officer.

- 4.1 **TGI and GEB senior management** are responsible for implementing, implementing, and monitoring compliance with the anti-bribery and anti-corruption management system throughout the organization. Likewise, they must ensure that roles and responsibilities within the system are assigned and communicated to all levels of the organization, as well as ensure the adequacy of resources. economic, physical, human, and technological that allow the effective implementation of the TGI and GEB system, as well as continuous improvement, ensuring that the corporate strategy is aligned with this Policy.
- 4.2 The **Compliance Department** will be in charge of leading the internal management for the implementation, follow-up, monitoring, control and continuous improvement of this Policy, providing advice and permanent guidance to all stakeholders on the operation of the system and reporting periodically to the highest governing body. Likewise, it must ensure that the documents related to the system comply with the required technical and legal specifications.

The scope of its management includes the periodic evaluation of this policy, to establish its relevance and functionality, making the necessary adjustments if required. The Compliance Directorate will exercise the function of anti-corruption and anti-bribery compliance, which is why it enjoys sufficient authority and dependence to access the highest governing body and optimally lead its performance.

- 4.3 The **administrators and collaborators** are responsible for the application and full compliance with this policy, as well as for the achievement and obtaining of binding agreements with third parties related to the commitments declared herein, cementing their actions in the legality, ethics and transparency, as well as in corporate values and the Code of Ethics and Conduct.

Likewise, they are responsible for complying with the manuals and other guidelines, procedures and documents adopted in the organization for the prevention of corruption and bribery and their associated risks.

4.4 The **communications area** is responsible for communicating and disseminating this Policy through available means so that it is known by all the organization's stakeholders.

4.5 **Internal Audit** is responsible for evaluating the implementation and compliance with this Policy and other guidelines, procedures and documents that complement it.

5. PENALTIES FOR NON-COMPLIANCE WITH THE POLICY

It is the responsibility of the shareholders, directors, collaborators and all stakeholders of TGI and GEB and, in general, of any person who represents, directly or indirectly, the company and/or the Group, to comply with the commitments assumed in this Policy. Therefore, in case of non-compliance, the following sanctions will be applicable, always guaranteeing due process and the right of defense and contradiction:

- **Shareholder:** the sanction and/or corrective measure determined by the Shareholders' Meeting will be applicable.
- **Managers:** the sanctions provided for in the Code of Ethics and Conduct will be applicable. Removal and/or such action as may be determined by the Board of Directors.
- **Employees:** the sanctions provided for in the Code of Ethics and Conduct, employment contract, internal work regulations and applicable legislation will be applicable.
- **Suppliers and/or contractors:** the consequences provided for in the Code of Ethics and Conduct for Suppliers and Contractors, clauses included in contracts or purchase orders, other internal guidelines and applicable legislation will apply.

The foregoing without prejudice to the legal consequences arising from non-compliance, such as labor, civil, administrative, criminal, among others.

NOTE OF VALIDITY

This policy applies from the date of issue.

This policy was approved by the Board of Directors and is effective on December 5th, 2022.

MONICA LETICIA CONTRERAS ESPER
President TGI S.A.E.S.P

Elaborated: VJA / Angélica C. Mora S. / Johan L. Espinel B.

Reviewed: VJA / Dalila A. Hernández C